

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: Methyl *tertiary* Butyl Ether ("MtBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL No. 1358 (SAS)

This Document Relates To:

DECLARATION OF  
NATASHA MOLLA

*Orange County Water District v. Unocal  
Corporation, et al.*,  
Case No. 04 Civ. 4968 (SAS)

**DECLARATION OF NATASHA MOLLA**

I, Natasha Molla, do hereby declare under penalty of perjury as follows:

1. My name is Natasha Molla. I am over the age of 21 and am fully competent to make this Declaration. This Declaration is based on my personal knowledge of the matters set forth herein and the documentary evidence that has been produced in this matter. The statements set forth herein are true and correct.

2. I am the Team Leader for Chevron Environmental Management Company's Retail and C&I-Southwest Team, which is a part of the Marketing Business Unit. In this position, I am responsible for overseeing and supervising environmental projects related to Chevron's current and former retail stations in the State of California.

3. I obtained my Bachelor of Science degree in geological studies from California State University, Fullerton in 1992. In 1994, I obtained an Environmental Site Assessment and Remediation Certificate through the University of California, Irvine. Since obtaining my degree in 1992, I have held in various positions where I have worked on the assessment and remediation of contamination at gasoline stations. My resume, attached as Exhibit A to this Declaration, details my experience. I began working at Chevron in 2002 as a Project Manager. Since 2007, I have been a Team Lead at Chevron, and in that role, I manage three project managers and approximately 50 sites in Northern and Southern California.

4. During the course of my normal employment and during the course of this litigation (and in particular, in preparing to testify on behalf of Chevron as its corporate representative), I have reviewed numerous regulatory filings for and otherwise educated myself regarding Chevron #9-1921, Chevron #9-5401, Unocal #5376, and Unocal #5123. As a result, and based on my position at Chevron and this review, I am knowledgeable of the environmental history at these sites.

5. Remediation has been occurring at Chevron #9-1921 (3801 S. Bristol Street, Santa Ana, California) since at least 1988 through the present and is overseen by the Regional Water Quality Control Board—Santa Ana Region (the “Regional Board”).

6. In October 1988, the underground storage tanks at Chevron #9-1921 were excavated and replaced. During November 1989 and April 1990, nine groundwater monitoring wells were installed. In September 1990, Chevron performed hydraulic conductivity slug tests in three groundwater monitoring wells. Quarterly groundwater monitoring at Chevron #9-1921 began in May 1990.

7. In March 1991, a vapor extraction test was performed at Chevron #9-1921. Between April and May of 1995, Chevron upgraded the tank system at Chevron #9-1921, which included the installation of tank level monitoring systems and the replacement of the existing piping system with double-walled fiberglass piping and Chevron also conducted excavation at the site. In May 1998, approximately two gallons of liquid phase hydrocarbons were removed from Monitoring Well No. 7. During 2005 and 2006, Chevron also conducted overpurgings of selected wells at Chevron #9-1921.

8. During May 2007, Chevron performed a multi-phase extraction (“MPE”) pilot test and determined that MPE would be technically feasible at Chevron #9-1921. Chevron then

removed the tanks, dispenser islands, and associated piping at Chevron #9-1921 during July and August of 2007. In July 2009, the Regional Board informed Chevron that a change from quarterly to semiannual sampling and monitoring frequency was appropriate. As of December 2010, Chevron had installed a dual-phase extraction ("DPE") remediation system at Chevron #9-1921 and will operate that system moving forward.

9. The historical maximum detection of MTBE at Chevron #9-1921 was 190,000 ug/L in June and September of 1998. MTBE detections have gone down since that time, as the current maximum detection of MTBE is 560 ug/L at Chevron #9-1921.

10. As such, the various remediation systems in place at Chevron #9-1921 appear to have been effective over time, and I have seen no evidence that Chevron #9-1921 poses a risk to groundwater or offsite sensitive receptors.

11. Remediation has been occurring at Chevron #9-5401 (5992 Westminster, Westminster, California) since at least 1996 through the present and is overseen by the Orange County Health Care Agency.

12. Monitoring wells were first installed at Chevron #9-5401 in November 1996. Additional monitoring wells were installed at Chevron #9-5401 in March 1998, September 2000, September 2001, and June 2004. In May 2000, Chevron conducted a soil boring investigation, followed by a geoprobe boring investigation in December 2003 at Chevron #9-5401. Chevron continues to monitor the groundwater at Chevron #9-5401.

13. The historical maximum detection of MTBE at Chevron #9-5401 was 65,000 ug/L in June 1997 using EPA Method 8020/8021. MTBE detections have gone down since that time, as the current maximum detection of MTBE is 26 ug/L at Chevron #9-5401. The latest groundwater monitoring report, dated January 27, 2011, concluded that the groundwater at



Chevron #9-5401 has the necessary elements to facilitate the continued biodegradation of petroleum hydrocarbons and that closure is warranted.

14. Thus, the remediation systems in place at Chevron #9-5401 appear to have been effective, and I have seen no evidence that Chevron #9-5401 poses any threat to the groundwater or offsite sensitive receptors.

15. Remediation has been occurring at Unocal #5376 (8971 Warner Ave., Huntington Beach, California) since at least 1989 through the present and is overseen by the Orange County Health Care Agency.

16. In September 1989, three underground storage tanks were excavated and removed from Unocal #5376, and in 1990, four onsite groundwater monitoring wells were installed. In December 1991, a vapor extraction test was conducted. Between 1992 and 1994, an additional seven groundwater monitoring wells were installed at Unocal #5376. In 1996, a vapor extraction system was installed and began operating at Unocal #5376. In 1997, two nested vapor extraction/air sparge wells were installed at this site. In 1998, an air sparge system supplemented remediation. The vapor extraction system operated at Unocal #5376 until 1999, when it was shut down to develop the site and was then run intermittently from 2000-2005. The operation of the two-phase extraction system resulted in the removal of approximately 1.24 million gallons of groundwater and the removal of approximately 37,370 pounds of hydrocarbons in the vapor phase. The system was shut down in 2005 due to asymptotic low removal rates.

17. In December 2010, the Orange County Healthcare Agency conditionally approved depth discrete groundwater sampling at Unocal #5376. Currently, the groundwater remediation technique used at Unocal #5376 is natural attenuation. Upon completion of the depth discrete groundwater sampling work plan (dated September 30, 2010), a case closure request for Unocal

#5376 will be submitted. Until then, groundwater monitoring and sampling will continue at Unocal #5376.

18. The historical maximum detection of MTBE at Unocal #5376 was 1200 ug/L in February 2001. MTBE detections have gone down since that time, as the current maximum detection of MTBE is 2.0 ug/L at Unocal #5376.

19. Accordingly, the remediation systems in place at Unocal #5376 appear to have been effective. I have seen no evidence that Unocal #5376 poses any threat to the groundwater or offsite sensitive receptors.

20. Remediation has been occurring at Unocal #5123 (14972 Springdale, Huntington Beach, California) since at least 1990 through the present and is overseen by the Orange County Health Care Agency.

21. In August 1990, manual free product recovery was initiated at Unocal #5123. In 1992, an automatic groundwater extraction and free-product recovery system was installed and began operating at Unocal #5123. The service station at Unocal #5123 was demolished in 1994, and underwent testing for MTBE in 1996. Between 1998 and 2001, approximately 32 monitoring wells were installed at Unocal #5123.

22. In 2002, a DPE system was installed and began operating at Unocal #5123. The system was shut down in January 2004 and restarted in June 2004, operating until December 2006. The system was again restarted in February 2008 and operated until July 2009 when it was shut down to investigate the source of a water discharge exceedance. An interim remedial program utilizing a vacuum truck to extract groundwater was then initiated in March 2010. In July 2010, groundwater extraction and treatment resumed at Unocal #5123. Since then, the

Orange County Healthcare Agency has approved a DPE pilot test work plan and DPE pilot testing field activities were conducted in April, May, and June of 2010.

23. The historical maximum detection of MTBE at Unocal #5123 was 32,000 ug/L in February 1996. MTBE detections have gone down since that time, as the current maximum detection of MTBE is 130 ug/L at #5123.

24. Thus, the remediation systems in place at Unocal #5123 appear to have been effective, and I have seen no evidence that Unocal #5123 poses any threat to the groundwater or offsite sensitive receptors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Brea, California, this 11 day of March, 2011.

  
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Natasha Molla



**Natasha P. Molla**

**EXPERIENCE**

**TEAM LEAD/PROJECT MANAGER**

Chevron Environmental Management Company, Brea, CA

12/02 to present

As a team lead I manage 3 Project Managers whose sites are in Northern and Southern California. In addition manage approximately 30 sites in S. California.

**PROJECT MANAGER**

Harding ESE, a MACTEC Co., Pomona, CA

4/00 to 12/02

Bechtel Environmental, Inc., Norwalk, CA

8/98 to 4/00

As a consultant project manager, I communicated regularly with the Chevron Project Managers and agencies to ensure goals are met.

**GEOLOGIST**

Bechtel Environmental, Inc., Norwalk, CA

5/94 to 8/98

I worked on the Unocal and Chevron Multi-Site Projects. I was responsible for scheduling and conducting field work for underground storage tank (UST) removal/replacements, Phase I assessments, and subsurface assessments. I have several years of experience drilling soil borings, designing and installing groundwater and vadose monitoring wells, and water, soil and soil vapor sampling. I have conducted data analysis, prepared and reviewed reports and agency response letters; and supervised and coordinated the daily activities of professionals and subcontractors. I was a liaison between the client and regulatory agencies.

Geraghty & Miller, West Covina, CA

8/93 to 5/94

Assisted in hydrocarbon assessment and remediation projects relating to releases from USTs and pipelines. I performed database management for a large landfill project and project budgets.

The Reynolds Group, Tustin, CA

9/92 to 5/93

Proposed, coordinated, and conducted assessments of gasoline releases. Assessments involved the identification and delineation of subsurface releases from USTs and surface sources to soil and groundwater. Responsibilities included overseeing drilling, logging and sampling soil borings, installing, developing and sampling groundwater monitoring wells, permitting, and sampling of UST closure excavations. Preparation of Health and Safety plans, field investigation reports, groundwater monitoring reports, and closure reports. Conducted Phase I Environmental Site Assessments for various financial institutions.

**GEOLOGICAL TECHNICIAN**

Chevron Oil Field Research Company, La Habra, CA

6/91 to 9/92

Executed simulations on basin modeling software, and assisted in interpretation of data and writing scientific reports from paleoclimate simulations for proprietary company use and publication.

**FACILITY & STRATEGIES CLASS LEADER**

California State University, Fullerton, Fullerton, CA

1/92 to 5/92; 8/89 to 5/91

**EDUCATION**

- B.S. Geological Sciences, California State University, Fullerton.
- A.A. Degree, Mt. San Antonio College, Walnut, California.
- Environmental Site Assessment and Remediation Certificate, UCI.

